June 10, 2016

Helen Bottcher, Project Manager (ECL-122)
U.S. EPA Region 10
1200 6th Ave., Suite 900
Seattle, WA 98101

Re: Citizen Comments on the Wyckoff/Eagle Harbor Superfund Site Proposed Plan

Dear Helen:

This letter provides public comments on the Wyckoff/Eagle Harbor Superfund Site Proposed Plan. As Bainbridge Islanders and Technical Assistance Grant Committee participants, we've witnessed and reviewed Wyckoff/Eagle Harbor's investigation and cleanup for almost 30 years. As Environmental Geochemist and technical readers, we recognize the site's complexities and respect EPA's willingness to reassess the preferred remedy in light of the last 15 years' technological developments.

Alternative 4 Greater Ranking than Alternative 7 (or 7A)

- The Soil and Groundwater OU2/OU4 Focused Feasibility Study (FFS) ranks Alternatives 4 and 7 identically based on the National Contingency Plan's required Nine Criteria (Table ES-1). However, Table ES-2 identifies Alternative 4's technology duration as 10 years compared with Alternative 7's almost 24 to 34 years. This comparison suggests that the two alternatives should be ranked differently for Short-term Effectiveness, with Alternative 4 ranking higher. The shorter completion would also rank higher for Community Acceptance.
- Table ES-2 shows the cap in place under Alternative 4 by year 4, allowing the use of the park in the shorter term (and ranking higher for Community Acceptance).
- I understand that EPA had some concern about topographic changes in the site's surface from Alternative 4, however, the community and the Bainbridge Island Parks Department have consensus that topography is not a problem for the site's use as a park, as I understand plans for future use.
- Sheet pile wall: Alternative 4 includes solidification that creates a new bulkhead for the site while immobilizing contaminants; whereas Alternative 7 includes the installation of a new sheet pile wall in addition to a reinforced concrete bulkhead. The addition of driving the new sheet pile wall will have noise impacts on the community, would inhibit the final park configuration, and appears to be a redundant cost when compared with Alternative 4.
- Noise impacts for Alternative 7 are 7 years (vs. 3 years for Alternative 4) and involve prolonged traffic for the community. Further noise impacts include installing the new sheet pile wall and thermal treatment in addition to *insitu* stabilitization. Therefore, noise impacts for Alternative 7 appear longer and louder in impacts.
- As stated, traffic and roads maintenance are of greater impact and issue for Alternative 7 than for Alternative 4 due to the length of time and added activities. Where possible, barges should be used to transport materials and equipment via water.

Habitat Value in New Concrete Bulkhead: Seattle Seawall Project

Seattle's replacement seawall has been designed to maximize its habitat value. We see an opportunity to benefit from Seattle's studies and designs with the new cement wall to maximize its habitat

potential. While Eagle Harbor is a working harbor, the head of Eagle Harbor is considered a valuable nursery for fish and wildlife. Bainbridge Island is considered essential to fish and marine health of middle Puget Sound. The Bainbridge Island Community thanks EPA for its efforts to restore this valuable ecosystem and encourages the use of fisheries and wildlife experts to complete not only the cleanup but to restore the Park to its fullest value as ecosystem. EPA can benefit from the designs used by the Seattle Seawall Project in the completion of the cement wall for Alternative 4. The shorter timeframe for completion of Alternative 4 will then have greater value as it not only completes the cleanup, provides public access to a cherished park, but also increases the habitat value at the mouth of Eagle Harbor, benefiting Puget Sound.

Beach Cleanups to ISS Onsite
For the Nearshore/Beach Operable Unit cleanups, is it EPA's intent when excavating contaminated beach to consolidate it onsite and use stabilization to treat it with OU2/OU4? If this is not the intent, we recommend the consolidation of contaminated soil and sediment to minimize the need for offsite transport and disposal.

Road Maintenance Upgrade for Bicycle and Pedestrian Safety
With any alternative, Eagle Harbor Drive and possibly other roads will need upgrades to allow the travel of large trucks and due to the wear of extra traffic. Like the Concrete Habitat Wall, the road upgrades provide a valuable opportunity to include bicycle lanes that may be used by pedestrians—so that the many commuters and community members may safely bike and walk during the active cleanup.

In summary, we find that Alternative 4 would rank higher than Alternative 7 using the National Contingency Plan's required Nine Criteria because it achieves protectiveness in a shorter timeframe with less impacts on the community by traffic, noise, and road maintenance, returning the site to the community for use as a park sooner. With Alternative 4, the beach cleanups can be consolidated and treated as part of the upland and then capped. We strongly recommend seizing two valuable opportunities: (1) the use of designs from the Seattle Seawall Project to maximize the habitat value of the new concrete bulkhead and (2) including bicycle lanes in road upgrades for cyclist and pedestrian safety, to mitigate the considerable active cleanup traffic. Where possible, equipment and materials should be transported by barge rather than by truck via the narrow island roadways.

Thank you for the opportunity to comment and for the progress made under your able project management.

Sincerely,

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